

REMARKS

In the Office Action, claims 1-4 are rejected under 35 U.S.C. § 102(e) as allegedly anticipated by U.S. Patent No. 6,317,745 to Thomas et al. (hereinafter “Thomas”).

Applicants respectfully traverse all rejections of record.

Independent claim 1 is directed to a method for routing billing information over a network, comprising, *inter alia*:

forwarding said mainframe application files in batch mode to said centrally located mainframe system;

The Examiner alleges that Thomas discloses or suggests these claim limitations at col. 5, lines 55-63 and col. 20, lines 13-30. Applicants respectfully disagree.

The first cited portion of Thomas describes, *inter alia*, details of “a database including universal identifier numbers uniquely identifying accounts that of the payee.” (Thomas, col. 5, lines 63-65). According to Thomas, this database implements, in part, “a method of electronic funds transfer between a payor and a payee” (Thomas, col. 5, lines 60-61). This method includes the steps of “forming a descriptor of indicia identifying the payee using the encoded numerical information; comparing the formed descriptor with database descriptors stored in database supplied by a trusted third party until a match is found; and transmitting a universal identifier, associated in the database with the matching database descriptor and uniquely identifying the payee, to the trusted third party to facilitate payment to payee’s account.” (Thomas, col. 6, lines 31-38).

The second cited portion of Thomas describes details of “a batch matching job.” (Thomas, col. 20, line 13). According to Thomas, goal of this process is to eliminate the confusing entries from the descriptor database (“the test for a match at home banking systems, such as bank C, must be extremely strict, to avoid false matches. However, in

reviewing the descriptor database of all customers, the TTP may utilize certain techniques which require less stringent matching criteria. One such technique is descriptor inclusion. Descriptor inclusion may be utilized at the TTP to help ensure against the possibility that one name and address might be confused with another.”)(Thomas, col. 17, lines 11-19).

The above-mentioned descriptor inclusion technique is implemented by spawning two different instances of the original database descriptor file and then comparing these newly created files to one another as follows: “to carry out a matching of a database descriptor file with itself to check for descriptor inclusion in batch mode, the file of including descriptors (overfile) is augmented to contain multiple descriptors for each of its N/A descriptors.” (Thomas, col. 17, lines 55-58). Thomas further describes that “[t]he file of descriptors not so augmented is referred to in the following discussion as the “underfile.” The test for inclusion determines which descriptors, if any, in the underfile exhibit inclusion with respect to the overfile. In batch matching, two sorted files of descriptors are read in tandem, and records are compared only when their two first keys are equal.” (Thomas, col. 17, lines 61-67 and col. 18, line 1).

The “batch mode” expression of the claimed invention, a completely different type of processing from that described by Thomas, refers to the process of sending mainframe-based application files in batch mode. The cited portions of Thomas fail to disclose or suggest the “batch mode” processing of the claimed invention. This processing is implemented in accordance with the claimed invention in order to address the technical and practical realities of operation, and is an important part of the claim. For at least this reason, Thomas cannot anticipate claim 1.

Claim 2 recites the further limitation of “providing a file distribution agent for appending to said mainframe application files a HTTP header.” The file distribution agent

converts these files to HTTP (Hypertext Transfer Protocol) format for Internet transmission - in other words, processes a file to an HTTP post so as to make the mainframe file Internet-accessible. The portion of Thomas cited on page 2 of the Office Action (col. 16, lns. 50-67) describes the details of a process/system shown in FIG.7. This process is responsible for collecting at a TTP (Trusted Third Party) the DDA Files from participating banks and other financial institutions, consecutively storing this information into the database.

The cited portion of Thomas further describes that “[u]pon receipt by the trusted third party 13, the customer records are added to the central database 14. The name and address information supplied by participating banks forms a Customer Name and Address file at the TTP. This file is used by the TTP to create the descriptor database.” (Thomas, col. 16, lines 52-55).

Additionally, the cited portion of Thomas describes that “[t]he collection of descriptors, with UID’s assigned by the TTP appended thereto represented by reference numeral 64, is sent to banks 66, such as bank C, together with the token list (lookup table) to enable bank C to encode tokens corresponding to consumer-entered names and addresses and to compare the generated descriptor with those stored in the database of descriptors supplied by the TTP.” (Thomas, col. 16, lines 60-67).

The cited portion of Thomas fails to disclose or suggest appending an HTTP header to mainframe application files to make these files Internet accessible. For at least these reasons, Thomas cannot anticipate claim 2. Additionally, because claim 3 depends from and thereby includes all of the limitations of claim 2, claim 3 is also not anticipated by Thomas.

The Examiner did not present any basis for rejection of Claim 4. Applicants respectfully resubmit remarks below to the arguments made in response to rejection of Claim 4 in the previous Office Action mailed on March 27, 2006:

Claim 4 recites limitations comprising, *inter alia*:

providing multiple connectivity options into said switching system, said options including an open connection over public lines and a closed-line connection;

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forwarding by one of said customer service providers or one of said biller service providers mainframe application files including said messages with one or more intended recipients over said closed-line connection to said switching system;

converting at said switching system said mainframe application files into Internet accessible addresses for delivery of said messages to said intended recipients over said public lines.

The cited portions of Thomas do not disclose transmission of data over both a “closed-line connection to said switching system” and “public lines.” While Thomas discloses the use of a single connection, and indicates that that connection may *alternatively* be (1) a modem and dedicated phone line, (2) an ISDN network, or (3) an Internet interface (*See* Thomas, col. 9, line 66 – col. 10, line 2), Thomas does not disclose providing multiple connectivity options into said switching system, including an open connection over public lines and a closed-line connection, forwarding a mainframe application file over a closed-line connection, and then converting the mainframe application file into an Internet-accessible address for delivery over the public line. Accordingly, for the foregoing reasons, Applicants respectfully submit that claim 4 is not anticipated by Thomas.

**CONCLUSION**

In view of the foregoing remarks, favorable consideration and allowance of claims 1-4, all pending claims, are respectfully solicited. In the event that the application is not deemed in condition for allowance, the Examiner is invited to contact the undersigned in an effort to advance the prosecution of this application.

Respectfully submitted,



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